

Message

From: Leo Brausch [lbrausch@consolidated.net]
Sent: 12/12/2014 9:38:10 PM
To: Santos, Carmen [Santos.Carmen@epa.gov]
CC: Krug, Robert@DTSC [Robert.Krug@dtsc.ca.gov]; Rykaczewski, Dave A. [dave.rykaczewski@wspgroup.com]; 'Cepko, Russ P' [Russ.Cepko@cbs.com]; 'Freudenberger, Rick E.' [rick.freudenberger@wspgroup.com]; 'Waldman, Allen J.' [allen.waldman@wspgroup.com]; jeff.groy@cbs.com
Subject: PCB Remediation -- CBS Compton Facility

Carmen,

This email follows our telephone discussion of December 9, 2014 and provides CBS' initial responses to each of the requests for submittal of additional information as identified in EPA's December 5, 2014 conditional approval of the PCB remediation plan for the facility at 18020 South Santa Fe Avenue in Rancho Dominguez, California. This email specifically addresses those items identified by EPA to be submitted within 7 or 14 days of EPA's approval.

1. *A description of measures to prevent potential tenant exposure to PCBs during pre-cleaning sampling, pre-characterization Building cleaning activities, and characterization sampling. Such measures must describe the Parties approach to prevent mobilization of PCBs onto areas occupied and/or in use by tenants. In addition, the Parties must submit figures that clearly depict the location of physical barriers and pre-characterization Building cleaning containment areas relative to in-use and occupied tenant areas.*
 - As discussed with EPA, the procedures being used in the initial phase of pre-characterization cleaning will employ methods (*i.e.*, HEPA vacuuming, misting of surfaces to be wiped, and pre-wetting the floor to be scrubbed) that are specifically designed to minimize dust generation.
 - Areas of the building in which cleaning activities are being conducted will be condoned-off and clearly marked to caution tenant personnel against entering such areas.
 - CBS will coordinate with the building owner and tenant to allow the pre-characterization cleaning and sampling to be conducted in off-shift hours to the maximum extent practicable to reduce the potential exposure of tenant personnel. The intent is to finalize plans for the cleaning schedule at an on-site meeting in early January 2015.
 - Under separate cover, WSP will forward to EPA full-size prints of the plant and sample location map previously submitted to EPA.
2. *Confirm if proposed cleaning with Simple Green is intended to be a pilot study.*
 - Simple Green is a low-toxicity all-purpose detergent that should be effective in removing oily dirt from various surfaces, including the concrete floor, in advance of characterization sampling. CBS is not proposing the use of Simple Green cleaning as a pilot study for PCB decontamination of porous or non-porous surfaces.
3. *Figures depicting the location of the drains inside the Building that will be sampled. Prior to Building cleaning, discrete bulk "sediment" samples must be collected from each drain before removing the "sediments" for offsite disposal. These samples must be individually analyzed.*
 - CBS does not currently have a plant map showing drain locations. At the time of the on-site meeting planned for early January 2015, CBS will inspect accessible areas of the plant floor (*i.e.*, locations not covered by stored warehouse inventory) and identify drain locations. To the extent practicable, the drains will be opened at that time and inspected for the presence of sediment and to determine if the drains have been sealed. These drains will be individually sampled and cleaned as part of the pre-characterization sampling.
 - During the course of the pre-characterization sampling, additional floor drains may be exposed as inventory is moved. If additional drains are uncovered, these too will be inspected, individually sampled, and cleaned as applicable.

- The report on the pre-characterization sample will provide all identified drain locations on a plant site map with accompanying descriptions of whether or not the drain was sealed and the results of sampling and analysis of any sediment found in (and removed from) these drains.
4. *Additional air samples [are] to be collected before and after pre-characterization cleaning. The proposal must include revised figures and tables depicting the actual location and number of the additional air samples relative to those already included in the Application as amended by CBS. A reference outdoor air background sample must be collected concurrently with all indoor air samples.*
- As part of the on-site inspection planned for early January 2015, CBS will confirm the construction of the interior office, breakroom, and storage room that are located within the main warehouse (high-bay) area.
 - CBS will also confirm with the tenant the current and any planned changes in the usage of these rooms.
 - Based on this reconnaissance, CBS will propose additional pre-characterization air samples in tenant-occupied those beyond the samples identified in CBS' prior submittals.
5. *A written description of the measures to be implemented to prevent overloading of the PUF and quartz filter. The Parties must consult with their contract analytical laboratory on this matter since collection of 48-hour indoor air samples is proposed in the Application.*
- CBS is awaiting receipt of information from the sampling experts and will report to EPA once this information is received.
6. *Explain the measures the Parties will implement to prevent leakage of liquids contaminated with PCBs that may separate from the spent absorbent placed in plastic bags.*
- Excess (dry) absorbent or other drying agents can be added to waste containers/bags to ensure that solid wastes for cleaning activities do not leak free liquids.
 - CBS will discuss with its contractor additional measures that can be taken to prevent leakage of liquids containing PCBs from bags of solid waste.
7. *A description of the procedures to clean up or decontaminate the HVAC systems.*
- An inspection conducted on March 25, 2014 confirmed that the building does not have a centralized HVAC system. The office area on the west side and the interior office/breakroom area (below mezzanines) each have a separate forced-air HVAC system. As part of the pre-characterization cleaning, air vent covers will be removed and the ductwork inspected. If dust is present, accessible ductwork will be HEPA vacuumed.

As discussed in our December 9, 2014 call, CBS proposes to have all of the information requested by EPA in its conditional approval submitted to EPA on or before January 16, 2015. In the meantime, CBS will keep EPA apprised of its expected schedule for contractor mobilization.

We trust this submittal is responsive to your request. If you have questions, please do not hesitate to contact Russ Cepko or me.

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